

The Honorable Kymberly K. Evanson

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

ELIZABETH BOVA and PHILIP BOVA,

No. 3:24-cv-05208-KKE

Plaintiffs,

STIPULATED MOTION AND ORDER  
CONTINUING TRIAL DATE AND  
PRETRIAL DEADLINES

V.

## SUNBEAM PRODUCTS, INC.,

Defendant.

COME NOW Plaintiffs Elizabeth Bova and Phillips Bova, and Defendant Sunbeam Products, Inc., by and through their respective undersigned counsel, and hereby stipulate and jointly request an extension of approximately 60-days for the following deadlines in order for the parties to complete fact witness depositions, a joint evidence exam, expert discovery, and litigate all other remaining issues.

EVENT	DATE
TRIAL SET FOR 9:30 a.m. on	December 8, 2025
Disclosure of expert testimony under FRCP(a)(2)	May 9, 2025
All motions related to discovery must be filed by:	June 9, 2025

1	Discovery must be completed by:	July 9, 2025
2	All dispositive motions and motions challenging expert witness testimony must be filed by:	August 9, 2025
3	Settlement conference, if mediation has been requested by the parties per LCR 39.1, held no later than	October 8, 2025
4	Proposed jury instructions and agreed LCR 16.1 Pretrial Order due, including exhibit list with completed authenticity, admissibility, and objections fields	November 17, 2025
5	Trial briefs, joint brief on motions in limine, proposed voir dire questions, and deposition designations due	November 24, 2025
6	Pretrial conference	TBD

11        This is a complex product liability action, and the parties have been diligently litigating  
 12 this matter to date. Counsel for Plaintiff and Defendant have several cases pending nationwide  
 13 involving the same or similar products involved in Plaintiffs' lawsuit. Counsel for Plaintiffs and  
 14 Defendant have been working diligently and cooperatively to conduct discovery on these cases,  
 15 including the subject case in accordance with the schedules of the attorneys, witnesses, experts,  
 16 and various court deadlines. Document discovery is voluminous and involves hundreds of  
 17 thousands of pages.

18        While the parties have been diligently moving this litigation forward, it is not possible for  
 19 the parties to meet the Court's current deadlines. Based on the facts described herein, the parties  
 20 jointly request that aforementioned deadlines be extended by approximately 60-days. Under the  
 21 circumstances described herein, because the parties cannot meet the current deadlines, good cause  
 22 exists to modify the operative Scheduling Order.

23        This is the parties' first request to modify the Schedule Order.

1 DATED this 7th day of March, 2025.

2 I certify that this memorandum contains 336  
3 words, in compliance with the Local Civil Rules.

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8 **ORDER**

9 The Court GRANTS the parties' stipulated motion to continue the trial date and pretrial  
10 deadlines. Dkt. No. 25. The trial date and unexpired deadlines in the previous case schedule (Dkt.  
11 No. 13) are VACATED, and the courtroom deputy shall enter an amended case schedule in  
12 accordance with the parties' stipulated motion.

13 DATED this 7th day of March, 2025.

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16 Kymberly K. Evanson  
17 United States District Judge  
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